

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

*Estate of John Patrick O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, No. 1:04-cv-01076 (GBD)(SN)

*August Bernaerts, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11865 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT  
OF MOTION TO CORRECT PLAINTIFF'S NAME**

JERRY S. GOLDMAN, Esq., hereby declares under penalty of perjury, as provided for by 28 U.S.C. § 1746, as follows:

1. I am the attorney representing the Plaintiffs in the above-referenced actions, and I submit this Declaration in support of the Plaintiffs' Rule 60(a) Motion to Correct the name of a Plaintiff (both in her individual capacity and as personal representative of an estate of a 9/11 decedent) whose name has changed since the filing of the above-captioned matters.

2. The Plaintiff has advised my firm of a change in her marital status, and as such she has legally changed her name. This change occurred after the filing of the above-referenced actions. The Plaintiff is identified on the Proposed Order.

3. The corrections requested are simply clerical in nature and will not in any way change the Court's disposition of this case.

4. For the foregoing reasons, the Plaintiffs respectfully request that the Court grant the within motion and allow undersigned counsel to enter said Plaintiff's correct name into the Court's ECF system so that said Plaintiff may be properly identified during the electronic filing process of any documents in this MDL action and the related aforementioned action.

Dated: New York, New York  
November 8, 2024

/s Jerry S. Goldman  
Jerry S. Goldman, Esq.